Indiana State Board of Accounts Internal Controls

Cities & Towns
July 2019

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Internal Controls



- ✓ Components of Internal Control
- ✓ Creating an Effective Internal Control System
- **✓ Compensating Controls for all Sized Units**
- ✓ What Internal Controls Do & Don't Do
- ✓ Case studies

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Creating Internal Controls



What are Internal Controls

- IC 5-11-1-27 to promote government accountability & transparency
- IC 5-11-1-27(e) SBOA defines the acceptable minimum level of standards
- Uniform Internal Control Standards for Indiana Political Subdivisions

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Creating Internal Controls - Defined



SBOA definition:

- Internal control is a process executed by officials and employees that is designed to provide reasonable assurance that the objectives of the political subdivision will be achieved;
- It is a basic element fundamental to the organization, rather than a list of added on tasks;
- It is an adaptable process that is a means to an end, not an end in itself;

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Creating Internal Controls - Defined



SBOA definition (continued):

- It is focused on the achievement of objectives; and
- It is dependent on officials and employees for effective implementation.

Uniform Internal Control Standards for Indiana Public Subdivisions, p. 3

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Internal Controls Standards



UNIFORM INTERNAL CONTROL STANDARDS FOR INDIANA POLITICAL SUBDIVISIONS



Paul D. Joyce, CPA State Examiner

September 2015

SECTION ONE

Minimum Level of Internal Control Standards

- Five Components
- Seventeen Principles

SECTION TWO

Approved Training Materials

- Video Presentation
- Examples
- Case Studies

www.in.gov/sboa/files/UniformInternalControlStandards.pdf

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Internal Controls Objectives



Operations

Operational & performance goals; best use of resources

Reporting

Financial Statements, 100-R, etc.

Compliance

Adherence to laws & regulations

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Internal Controls

* EST. 1908 *

Internal Control Components:

- Control Environment
- Risk Assessment
- Control Activities
- Information & Communication
- Monitoring



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Creating Internal Controls – Getting Started





Don't reinvent the wheel

Identify existing controls

Document, document

- Write down who does what
- Make lists

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Creating Internal Controls – Getting Started (continued)



Establish Control Environment

- "Tone at the top"
- Missions, goals, and objectives
- Structure, organization, reporting chains

Review & Analyze Current Controls

- Look for weak areas
- Assess risk & take appropriate actions

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Creating Internal Controls – Getting Started (continued)



Evaluate Resources

Staffing levels, other assets

Assign Duties/Tasks/Activities

Control activities

Communicate

Handbooks, training sessions, etc.

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Creating Internal Controls – Getting Started (continued)



Monitoring

- Implement controls to ensure everything you've established is being completed
- Obtaining goals & objectives?
 - If not modify existing controls

https://www.evolvetech.biz/2017/01/30/smart-monitoring-happy-end-users/

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Segregation of Duties – Compensating Controls



Splitting duties between individuals

- Prevent controls segregated duties can prevent errors & irregularities
- No single person authorizing, recording, custody of transactions
- More difficult with fewer employees
 - Compensating controls may be necessary

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Segregation of Duties - Compensating Controls



Compensating for lack of segregation of duties

- One employee
- Control should prevent or detect errors or misstatements
- One person performs another reviews/approves
 - Bank Reconcilement
 - > AFR
 - Revenue reports

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Internal Controls – What Do They Do / Don't Do



What Do They Do:

- Preventative
 - Designed to prevent errors/irregularities
- Detective
 - > Designed to detect undesirable occurrences
- Promote effective operations
- Safeguard resources
 - > Loss due to waste, misuse, fraud, etc.
- Develop reliable data for accurately reporting

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Internal Controls - What Do They Do / Don't Do



What Don't They Do:

- Catch everything
 - > Reduces risk / doesn't 100% eliminate it
- Result from strong policies & procedures
- They don't always work
 - > If not effective, re-assess and make changes

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Sample Internal Control Policies



New Castle, Indiana:

www.cityofnewcastle.net/egov/documents/1465396308_11682.pdf

Camden, Indiana:

www.townofcamden.org/wp-content/uploads/2014/09/Internal-Controls-Policy-and-Procedures.pdf

LaPorte, Indiana

www.cityoflaporte.com/DocumentCenter/View/1472/Ord--Internal-Control-Standards-5-11-2016?bidId=

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Sample Internal Control Policies



Lakeland, Tennessee

- Suburb of Memphis / population 12,618 ('17)
- www.lakelandtn.gov/DocumentCenter/View/5531

Franklin, Tennessee

- Suburb of Nashville / population ~ 80,000
- www.franklintn.gov/home/showdocument?id=28021





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Internal Controls – Useful Links



www.mtas.tennessee.edu/download/file/fid/48575

 Downloads pdf – is geared toward statutory provisions in Tennessee but methods could be used for Indiana municipalities)

www.vlct.org/resource/internal-financial-controls-checklist-municipalities

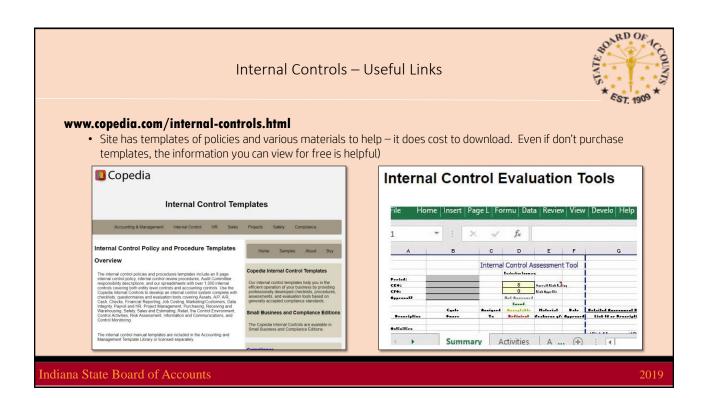
• Vermont has a league of cities and towns with this resource document

www.auditnet.org/audit-library/auditnet-internal-controls-primer

www.hudoig.gov/sites/default/files/Internal%20Controls%20Integrity%20Bulletin%20CPD.pdf

bizfluent.com/how-5120417-design-internal-control-system.html

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Case Study - Payroll



Review Payroll Disbursements

- 2nd person involved to review
- Compared disbursements to salary ordinance/schedule

Communication of Inconsistencies

Reported to management

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Case Study – Bank Reconciliation



Monthly Bank Reconcilement

Ind. Code 5-13-6-1

Unidentified Transactions

Communication

Notified bank – loss timely reimbursed

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Case Study – Receipts



Historical Comparison

Reviewed receipts over a certain period

Unexplained Variances

Significant decline noticed

Communication

Notified SBOA and law enforcement

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Case Study - Credit Cards



Review of Supporting Documentation

Support for each disbursement on statement

Unusual Activity

No support / personal purchases identified

Communication

Notified fiscal officer

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Reporting to SBOA – IC 5-11-1-27



- All erroneous or irregular material
 - ✓ Variances
 - ✓ Losses
 - ✓ Shortages, or
 - ✓ Thefts
- Actual knowledge of or reasonable cause to believe that there has been a misappropriation of public funds

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Reporting to SBOA — IC 5-11-1-27 www.in.gov/sboa - Responsibilities under IC 5-11-1-27 Responsibilities under IC 5-11-1-27 Pursuant to [C 5-11-1-27()], all political subdivisions are required to report to us all erroneous or irregular material variances, losses, shortages, or thefts of local funds or property. For the purposes of this IC section, material is defined by the State Examiner in State Examiner Directive 2015 6. Please use the following form to report this information to us. All fields are required. Name:* Email:*

Common Audit Findings



- Did not separate incompatible activities related to receipts, disbursements, and payroll.
- Did not have a review or approval process over bank reconciliation or over financial close & reporting.
- There was no evidence of an oversight, review, or approval process.

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Take Action



- Review Internal Control Manual
- ✓ Continue to Establish Procedures
- ✓ Address all Five Internal Control Components
- Update Procedures as Needed



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